

STATE OF SOUTH CAROLINA

(Caption of Case)

Petition of Duke Energy Carolinas, LLC and Duke
Energy Progress, LLC for Approval of CPRE Queue
Number Proposal, Limited Waiver of Generator
Interconnection Procedures, and Request for
Expedited Review

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET
NUMBER: 2018 - 202 - E

(Please type or print)

Submitted by: Charles L.A. TerreniSC Bar Number: 15235Address: 1508 Lady StreetTelephone: 803-771-7228Columbia, SC 29201Fax: 803-771-8778

Other: _____

Email: charles.terreni@terrenilaw.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition☐ Request for item to be placed on Commission's Agenda expeditiously☒ Other: Routine

INDUSTRY (Check one)

- ☒ Electric
☐ Electric/Gas
☐ Electric/Telecommunications
☐ Electric/Water
☐ Electric/Water/Telecom.
☐ Electric/Water/Sewer
☐ Gas
☐ Railroad
☐ Sewer
☐ Telecommunications
☐ Transportation
☐ Water
☐ Water/Sewer
☐ Administrative Matter
☐ Other: _____

NATURE OF ACTION (Check all that apply)

- | | | |
|--|--|--|
| <input type="checkbox"/> Affidavit | <input type="checkbox"/> Letter | <input type="checkbox"/> Request |
| <input type="checkbox"/> Agreement | <input type="checkbox"/> Memorandum | <input type="checkbox"/> Request for Certification |
| <input type="checkbox"/> Answer | <input checked="" type="checkbox"/> Motion | <input type="checkbox"/> Request for Investigation |
| <input type="checkbox"/> Appellate Review | <input type="checkbox"/> Objection | <input type="checkbox"/> Resale Agreement |
| <input type="checkbox"/> Application | <input type="checkbox"/> Petition | <input type="checkbox"/> Resale Amendment |
| <input type="checkbox"/> Brief | <input type="checkbox"/> Petition for Reconsideration | <input type="checkbox"/> Reservation Letter |
| <input type="checkbox"/> Certificate | <input type="checkbox"/> Petition for Rulemaking | <input type="checkbox"/> Response |
| <input type="checkbox"/> Comments | <input type="checkbox"/> Petition for Rule to Show Cause | <input type="checkbox"/> Response to Discovery |
| <input type="checkbox"/> Complaint | <input type="checkbox"/> Petition to Intervene | <input type="checkbox"/> Return to Petition |
| <input type="checkbox"/> Consent Order | <input type="checkbox"/> Petition to Intervene Out of Time | <input type="checkbox"/> Stipulation |
| <input type="checkbox"/> Discovery | <input type="checkbox"/> Prefiled Testimony | <input type="checkbox"/> Subpoena |
| <input type="checkbox"/> Exhibit | <input type="checkbox"/> Promotion | <input type="checkbox"/> Tariff |
| <input type="checkbox"/> Expedited Consideration | <input type="checkbox"/> Proposed Order | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Interconnection Agreement | <input type="checkbox"/> Protest | |
| <input type="checkbox"/> Interconnection Amendment | <input type="checkbox"/> Publisher's Affidavit | |
| <input type="checkbox"/> Late-Filed Exhibit | <input type="checkbox"/> Report | |

Print Form

Reset Form

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2018-202-E

In Re:

**Petition of Duke Energy Carolinas, LLC
and Duke Energy Progress, LLC for
Approval of CPRE Queue Number
Proposal, Limited Waiver of Generator
Interconnection Procedures, and Request
for Expedited Review**

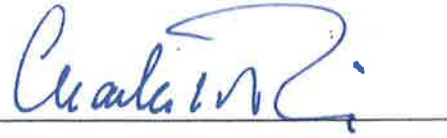
MOTION FOR ADMISSION
PRO HAC VICE

The Interstate Renewable Energy Council, through its undersigned counsel, hereby moves the Public Service Commission of South Carolina (“Commission”) to permit Laura D. Beaton to practice *pro hac vice* before the Commission in the above-captioned matter.

Pursuant to SCACR 404, Ms. Beaton, together with counsel of record, are simultaneously filing with the South Carolina Supreme Court a Verified Application for Admission *Pro Hac Vice* in the State of South Carolina.

WHEREFORE, in accordance with the provisions set forth in Rule 404, SCACR, Petitioners respectfully request that this motion be granted.

Respectfully submitted this 17th day of August, 2018.



Charles L.A. Terreni
Terreni Law Firm, L.L.C.
1508 Lady Street
Columbia, SC 29201
Telephone (803) 771 7228
Fax (803) 771-8778
charles.terreni@terrenilaw.com

Counsel for the Interstate Renewable
Energy Council, Inc.

1027347.1

**VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE*
IN THE STATE OF SOUTH CAROLINA**

Petition of Duke Energy Carolinas,
LLC and Duke Energy Progress,
LLC for Approval of CPRE Queue
Number Proposal, Limited Waiver
of Generator Interconnection
Procedures, and Request for
Expedited Review

Plaintiff

2018-202-E

Case No.

Public Service Commission

Tribunal

vs.

Mailing Address of Tribunal:

101 Executive Center Dr., Ste.
100

Columbia, South Carolina 29210

Defendant

Comes now Laura Beaton, applicant herein, and respectfully represents the following:

1. Applicant resides at:

69 Whitney Street, Apt. B

Street Address

San Francisco

San Francisco

CA

94131

City

County

State

Zip Code

541-206-0282

Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of)

Shute, Mihaly & Weinberser LLP

, with offices at

396 Hayes Street

Street Address

San Francisco

San Francisco

CA

94102

City

County

State

Zip Code

415-552-7272

N/A

415-552-5816

beaton@smwlaw.com

Primary Telephone

Cell Phone

Fax Number

Email Address

3. Applicant has been retained personally or as a member of the above-named law firm by

Interstate Renewable Energy Council, Inc.

to provide legal representation in

connection with the above case now pending before the above-named tribunal of the State of South Carolina.

4. Since December of 2013

, applicant has been, and presently is, a member in good standing of the bar of the highest court of the District of Columbia or the State of California where applicant regularly practices law. Attached is a certificate of good standing dated within the last 90 days from the bar of the highest court of the District of Columbia or the State where applicant regularly practices law.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.)

Court:	Date Admitted:
Courts of California	December 10, 2013
United States District Court, Northern District of California	May 2, 2016
United States District Court, Eastern District of California	August 26, 2016
United States Court of Appeals, Ninth Circuit	December 12, 2016
Courts of Montana	October 25, 2011
Supreme Court of the United States	June 18, 2018

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below: (List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

Not Applicable

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court date):

Affirmed

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

Affirmed

8. Applicant never has had any certificate or privilege to appear and practice before any court or administrative body suspended or revoked, except as provided below (give particulars, e.g., date, court, administrative body, date of suspension and reinstatement):

Affirmed

9. Local counsel of record associated with applicant in this case is Charles L.A. Terreni of the Terreni Law Firm, L.L.C. law firm, which has offices at:

<u>1508 Lady Street</u>			
Street Address			
<u>Columbia</u>	<u>Richland</u>	<u>SC</u>	<u>29201</u>
City	County	State	Zip Code
<u>(803) 771 7228</u>		<u>(803) 771-8778</u>	<u>charles.terreni@terrenilaw.com</u>
Primary Telephone	Cell Phone	Fax Number	Email Address
<u>15235</u>			
South Carolina Bar Number			

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

PSCSC Docket No. 2017-332-E, Open, 12/22/17, Robert Guild, Granted

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice in the above-named tribunal for this case only.

DATED this 9 day of August, 20 18



APPLICANT

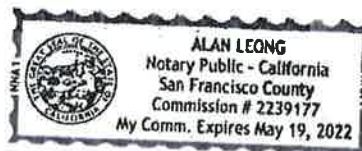
VERIFICATIONSTATE OF California)COUNTY OF San Francisco)

I, Laura Beaton, do hereby swear or affirm under penalty of perjury that I am the applicant in the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true. I understand that I am under a continuing duty to promptly update the information provided in the application until the tribunal has ruled on the motion for admission pro hac vice. Further, if the motion is granted, I understand that I am under a continuing duty to promptly update the information provided in the application as long as I continue to appear pro hac vice in the action or proceeding. Any updated information shall be provided to both the tribunal that granted the motion and to the tribunal in which the action or proceeding may then be pending.

[Signature]
APPLICANT/AFFIANT

Subscribed and sworn to before me this 9 day of August, 20 18

Notary Public for the State of California
My Commission Expires: 05/19/2022

**LOCAL COUNSEL CONSENT**

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 17th day of August, 20 18

[Signature]
LOCAL COUNSEL OF RECORD

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this

17th day of August, 20 18

[Signature] on behalf of Laura Beaton, Applicant
APPLICANT/AFFIANT



THE STATE BAR OF CALIFORNIA

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

CERTIFICATE OF STANDING

July 24, 2018

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, LAURA DERISE BEATON, #294466 was admitted to the practice of law in this state by the Supreme Court of California on December 10, 2013; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Denise Velasco
Custodian of Records

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2018-202-E

In Re:

Petition of Duke Energy Carolinas, LLC
and Duke Energy Progress, LLC for
Approval of CPRE Queue Number
Proposal, Limited Waiver of Generator
Interconnection Procedures, and Request
for Expedited Review

CERTIFICATE OF SERVICE

The undersigned, Amy Zehring, does hereby certify that the following persons have been served with one (1) copy of Motion for Admission *Pro Hac Vice* and Verified

Application in the above captioned proceeding by electronic mail and/or U.S. First Class

Mail at the addresses set forth below:

Andrew M. Bateman, Counsel
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201

Email: abateman@regstaff.sc.gov
Phone: 803-737-8440
Fax: 803-737-0895

Rebecca J. Dunlin, Counsel
Duke Energy Carolinas, LLC
Duke Energy Progress, LLC
1201 Main Street, Suite 1180
Columbia, SC 29201

Email: Rebecca.Dulin@duke-energy.com
Phone: 803-988-7130
Fax: 803-988-7123

Frank R. Ellerbe, III, Counsel
Sowell Gray Robinson Stepp Laffitte, LLC
P.O. Box 11449
Columbia, SC 29211

Email: fellerbe@robinsongray.com
Phone: 803-227-1112
Fax: 803-744-1556

Richard L. Whitt, Counsel
Austin & Rogers, P.A.
508 Hampton Street, Suite 300
Columbia, SC 29201

Email: rlwhitt@austinrogerspa.com
Phone: 803-251-7442
Fax: 803-252-3679

Timothy F. Rogers, Counsel
Austin and Rogers, P.A.
P.O. Box 11716
Columbia, SC 29201

Email: tfrogers@austinrogerspa.com
Phone: 803-712-9900
Fax: 803-712-9901

Executed in San Francisco, CA on August 17, 2018



Amy Zehring

1027356.1